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June 30, 2006

Charles L.A. Terreni  
 Chief Clerk/Administrator  
 Public Service Commission  
 Post Office Drawer 11649  
 Columbia, SC 29210

Re: Docket No. 2006-107-W/S  
 Application of United Utility Companies, Inc. for  
 Approval of an Adjustment of Rates and Charges for the Provision  
 of Water and Sewer Service

Dear Mr. Terreni:

I am enclosing herewith North Greenville University's First Set of Interrogatories to United Utility Companies, Inc.

By a copy of this letter I am sending all known parties a copy of North Greenville's Interrogatories.

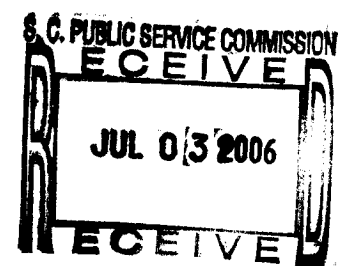
With kind regards, I am

Yours very truly,

*Duke K. McCall, Jr.*  
 Duke K. McCall, Jr.  
 Leatherwood Walker Todd & Mann, P.C.

DKM,Jr./bw

Enclosure



cc: Mr. John M. S. Hoefer  
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PO Box 8416  
Columbia, SC 29202-3416

Mr. Benjamin P. Mustian  
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Greenville, S.C. 29605

Mr. Newton Horr  
Lake Trollingwood Homeowners Ass'n  
131 Greybridge Road  
Pelzer, S.C. 29669

BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO.: 2006-107-W/S

IN RE:

Application of United Utility Companies, )  
Inc. for Adjustment of Rates and Charges )  
And Modification to Certain Terms and )  
Conditions for the Provision of Water and )  
Sewer Service. )  
\_\_\_\_\_ )

**NORTH GREENVILLE UNIVERSITY'S  
FIRST SET OF INTERROGATORIES**

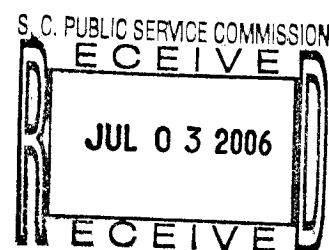
**TO: JOHN M. S. HOEFER, ESQ. AND BENJAMIN P. MUSTIAN, ATTORNEYS FOR  
THE APPLICANT, UNITED UTILITY COMPANIES, INC.**

North Greenville University ("NGU"), by and through its undersigned attorneys, hereby submits these interrogatories in accordance with 26 S.C. Code Regs. 103-851 (2004) and commands the Applicant, United Utility Companies, Inc. ("United Utility"), to provide answers within ten (10) days of service hereof to the offices of Leatherwood Walker Todd & Mann, P.C., 300 E. McBee Avenue, Suite 500, Greenville, South Carolina 29601.

**DEFINITIONS**

Unless otherwise stated, the terms set forth below are defined as follows:

1. "You" or "your" shall mean the Applicant, United Utility Companies, Inc., its directors, officers, managers, employees and agents, and all other persons acting on its behalf, including counsel.
2. "NGU" shall mean the North Greenville University and any of its directors, officers, managers, employees or agents, and all other persons acting on its behalf, including counsel.
3. The "Commission" shall mean the South Carolina Public Service Commission.



4. "SFE" shall mean a Single Family Equivalent as used by United Utility Companies, Inc. as a basis for computing a monthly service charge.

5. The "Facility" shall mean the wastewater treatment plant, wastewater collection facilities and all other assets utilized in the provision of wastewater utility service to North Greenville University.

6. "Document" or "documents" shall mean all written or printed matter of any kind including the originals and all non-identical copies thereof, whether different from the originals by reason of any notation made on such copies or otherwise, including without limitation: minutes, agendas, bills, contracts, leases, assignments, agreements, reports, summaries, inner-office and inter-office communications, offers, notations of any sort of conversation, diaries, appointments books or calendars, teletype, telefax, thermofax, confirmations, computer data (including E-Mail and all other information or programs stored in the computer whether or not ever printed or displayed), statistics, graphs, minutes, lists, appraisals, brochures, pamphlets, advertising or promotional materials; all drafts, alterations, modifications, changes and amendments of any of the foregoing; all graphics or manual records or representations of any kind, including, without limitation, photographs, microfilm, videotape records, motion pictures and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes, discs, magnetic cards and recordings.

7. "Identify" or "identity", when used in reference to an individual person, shall mean to state his or her full name, present or last known business address, telephone number and the name of such person's present or last known employer, place of employment and position, and place of employment and position during the time period of any event addressed by the

interrogatory in question; and state whether or not such a person is represented by counsel for purposes of litigation, and if so, by whom.

8. "Identify" or "identity" when used in reference to an entity shall mean to state its full and complete name and the present and last known address and telephone number of its headquarters or principal place of business.

9. "Identify" or "identity" when used in reference to a document shall mean to state the nature of the document (e.g., letter, memorandum, etc.); the name and title of the document; the date, if any, appearing on the document; the identity of the persons who wrote, signed, dictated, or otherwise participated in the preparation of the document; the identity of all persons to whom the document was addressed or who received copies of the document; and the present location and custodian of the document.

10. "Identify" or "identity" when used in reference to a property shall mean to state the description of the property, the location of the property and the current owner/occupier of the property.

11. "Person" or "persons" shall mean any natural person as well as firms, partnerships, associations, institutions, joint ventures, corporations, governmental entities, administrative agencies, professional associations, corporations and every other organization of whatever sort.

### **INSTRUCTIONS**

1. If you claim any form of privilege, whether based on statute or otherwise, as a ground for not answering an interrogatory or any part of an interrogatory, set forth all facts from which the claim of privilege is based.

2. If you claim any form of privilege, whether based on statute or otherwise, as a ground for not identifying requested oral communications or documents, set forth all facts upon which the claim of privilege is based, and for each document as to which you claim any form of privilege, identify the date, subject matter, location, author or authors, and recipient/recipients of the document, including all persons to whom the document has been provided or who have it in their possession.

3. Whenever a date, amount, or other computation or figure is requested, the exact date, amount or other computation or figure is to be given unless it is not known; and in that case, the approximate date, amount, or other computation or figure should be given or the best estimate thereof, and the answer should state that the date, amount, or other computation provided is an estimate or approximation.

4. Where facts are set forth in the answers or portions thereof and are supplied upon information and belief rather than your direct personal knowledge, you should so state and specifically identify each source of information and belief. Should you be unable to answer any interrogatory or portion thereof by either actual knowledge or upon information and belief, you should so state.

5. Whenever a full and complete answer to any interrogatory or subpart is contained in the document identified as answering a specific numbered interrogatory or subpart, the document or a copy may be supplied in lieu of a written answer.

6. Whenever an interrogatory calls for information which is not available to you in the form requested but is available in another form or can be obtained at least in part from other sources in your possession, so state and either supply the information requested in the form in which it is available or supply the sources from which the information can be obtained.

7. Each interrogatory shall be construed independently and not by reference to any other interrogatory herein for purposes of limitation.

8. Treat each numbered and lettered item in each interrogatory and on all attachments and exhibits as a separate interrogatory requiring a separate response. If you object to or are unable to answer one item, so state and respond to all other items.

### **INTERROGATORIES**

1. Identify the names and business titles of all people who provided information for the preparation of the Application.

2. Identify the names and business titles of all people who provided information for the preparation of the Application exhibits. Indicate the individuals who calculated the numbers for each Application exhibit and list the appropriate exhibit next to the individual's name.

3. Identify any construction and/or upgrades proposed or taking place at the Facility since the 2000-210-W/S rate case application was filed. Provide the project description and timeframe for completion.

4. State the actual and projected costs of each construction and/or upgrade listed in response to Interrogatory No. 3.

5. Identify any subsidiary, parent and affiliated companies of United Utility Companies, Inc. and state which entities, if any, are regulated by the Commission.

6. Identify all related party transactions during the test year. Related party transactions include, but are not limited to all transactions between yourself and your employees, officers, affiliated companies, parent company, subsidiaries and its employees or officers.

7. Describe any financing you have received from Utilities, Inc. in the form of donations, contributions, loans or transfers for the purposes of capital projects, construction

work-in-process, allowance for funds used during construction or contributions in aid of construction. Please specify the terms or conditions of any such loans, contributions or transfers.

8. Apart from items mentioned in response to Interrogatory No. 7, what payments or transfers have you made to Utilities, Inc. each year since the 2000-210-W/S rate case application was filed? Which of these payments or transfers represent profits you paid to Utilities, Inc.? If such payments or transfers are not the manner in which Utilities, Inc. receives profits from you, then specify how Utilities, Inc. receives such profits.

9. Provide the amount of water you pumped, purchased and sold since the 2000-210-W/S rate case application was filed. Please also provide your response electronically via an Excel spreadsheet.

10. Provide the complete detail of all revenue generated since the 2000-210-W/S rate case application was filed. Please also provide your response electronically via an Excel spreadsheet.

11. Provide the complete detail of all regular expenses paid since the 2000-210-W/S rate case application was filed and indicate which expenses are regularly occurring expenses which you will continue to pay in the future. Please also provide your response electronically via an Excel spreadsheet.

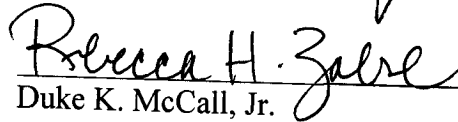
12. Provide detailed work papers for all proposed accounting and pro forma adjustments for revenues, expenses and rate base on Application Schedules B and C.

13. List and describe any settlements as well as pending or potential lawsuits that directly or indirectly have or may have an effect on your customer rates.

14. List all capital projects of \$100,000 or greater you have planned for the next ten years.



15. What were your total earnings during each year since the 2000-210-W/S rate case application was filed? If earnings were disbursed during one or more of these years, state in what amount and to what entities the earnings were disbursed.
16. Provide a list of the names of witnesses you intend to call and the subject matter for which each witness intends to testify at the hearing in this matter.
17. Describe any current, expected or settled litigation which may affect or did affect rates paid by customers.
18. How many SFEs have increased since the 2000-210-W/S rate case application was filed?
19. At the time of the 2000-210-W/S rate case application, how many SEFs were you using to determine NGU's service charge?
20. How many SEFs are you currently using to determine NGU's service charge?
21. How do you anticipate SEFs increasing in the next 5 years?
22. Describe in detail the ways in which you have primarily used the Facility since the 2000-210-W/S rate case application was filed.
23. Describe the predominant way you currently use the Facility.
24. How do you anticipate your use of the Facility to change in the next 5 years?
25. Describe the reasoning behind using SFEs instead of another means of calculating a service charge.
26. Do you consistently use SEFs for all customers, or are some customers charged using a different basis? If so, describe the different basis(es) and your reasoning for applying such basis(es) to each particular customer.



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June 30, 2006

Attorneys for North Greenville University